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## **REMARKS**

We have amended claims 1, 3, 4, and 7 to more particularly point out and distinctly claim the invention. Following entry of the amendments presented herein, claims 1-19 will be pending in this application.

The Examiner rejected Claims 1-19 under 35 U.S.C. § 103(a) as being unpatentable over Strong (U.S. Pat. No. 6,167,523) in view of Lee et al. (US 6535883 B1). The Examiner admits that Strong does not explicitly teach a markup language tag for instantiating a validation manager at the client computer and in response to processing the markup language file at the client computer, instantiating the validation manager. To supply that which is missing, the Examiner relies on Lee. We believe, however, that Lee does not supply that which the Examiner admits is missing from Strong, and that Strong is missing more than what the Examiner has recognized.

Lee does not supply that which the Examiner admits is missing from Strong. The Examiner says that Lee teaches the missing markup language tag for instantiating a validation manager at the client computer and the instantiation of the validation manager in response to processing the markup language file. In support of this assertion, he refers to portions of columns 5 and 6 from Lee. However, while Lee does discuss validating inputs into forms, and mentions performing validation on the client, nowhere does he talk about processing any markup language or using a markup language tag, let alone using such a tag for instantiating a validation manager at the client computer.

Moreover, contrary to what the Examiner appears to believe, Strong does not teach "in response to processing the markup language file ... instantiating the validation manager," as recited in claim 1. In support of his assertion to the contrary, the Examiner directs our attention to the following passage:

[T]he forms data validation and processing control program 255 is stored on the Web server 205. The handlers 260 associated with HTML forms to be processed, and the registry 270  $\dots$  are also stored on the Web server 205 (Col. 4 L. 62- Col. 5 L.1).

Strong does disclose processing a markup language file at the client, which results in displaying an HTML form on the client, and also running a validation program 255 on the Server (FIG. 2). However, Strong's data validation program 255 is triggered after the user submits the completed

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form and the data is transmitted to the server (Col. 7, lines 5-41) and is not instantiated in response to processing the markup language file on the client, as recited in the claim. Also, the Handlers are for processing the input data on the server, after validation is successfully preformed (FIG. 4; Col. 7, line 65-67) and are not related to instantiating a validation manager on the client, as recited in the claim.

Further, Strong does not teach that "in response to receiving text into the GUI element, sending a programmatic event to the validation manager; [and] in response to receiving the programmatic event at the validation manager, determining at the client computer whether the received text is valid text input," as recited claim 1 as amended. The Examiner asserts otherwise, and directs our attention to the following passages:

Following entry of data into the form 280, the form 280 is submitted by the client PC 200 user by clicking on the submit button 325 ... submitting the form causes data 290 from the form including input data entered into the form to be transmitted from the client PC 200 to the server 205 ... When the data 290 is received by the server 205 ... the form data validation and processing and processing program 255 controls data validation...(Col. 7, lines 5-27, emphasis added),

and

The Handlers subkey 502 defines how to process input data once validating has successfully performed ... The form data validation ... validates INPUT type fields in an HTML form ... Information that is entered into the field, however, may still have to meet specified requirements in order for the information to be considered valid (Col. 7, line 65-Col. 9, line 3).

We note, however, that none of the above passages, or any other section of Strong, teach the recited features about the programmatic event. As the above passages show, Strong's data validation is triggered on the server, and only after the user <u>submits</u> the form and the data is <u>transmitted to the server</u>. Thus, Strong's data validation occurs on the server, and in response to submission of the completed form and transmission of its data to the server. That is different from the features recited in the amended claim where, <u>in response to receiving text into the GUI element</u>, a programmatic event is sent to the validation manager, and in response to receiving that programmatic event at the validation manager, the received text is validated <u>at the client computer</u>.

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At least for the reasons stated above, we believe that independent claim 1, as well other rejected claims, all of which depend from claim 1, are allowable and therefore ask the Examiner to allow them to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 08-0219, under Order No. 2000874.00135US1 from which the undersigned is authorized to draw.

Dated: May 21, 2008

Respectfully submitted,

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